IN THE UNITED STATES DISTRICT COURT

AUG 9 2022

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS CLERK

| UNITED STATES OF AMERICA, | )  |
|---------------------------|--|
| Plaintiff,                | ) CRIMINAL NO. <u>22-1322</u> TCH  |
| VS.                       | Counts 1 and 2: 18 U.S.C. §§ 922(g)(1) and 924: Felon in Possession of a |
| ADAM ROBERT MANN,         | ) Firearm and Ammunition.  |
| Defendant.                | )  |

## INDICTMENT

The Grand Jury charges:

## Count 1

On or about May 31, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **ADAM ROBERT MANN**, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (1) possession with intent to distribute 5 grams and more of cocaine, and
- (2) trafficking in a controlled substance,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

## Count 2

On or about June 4, 2022, in Bernalillo County, in the District of New Mexico, the defendant, **ADAM ROBERT MANN**, knowing that he had been convicted of at least one crime punishable by imprisonment for a term exceeding one year, specifically:

- (3) possession with intent to distribute 5 grams and more of cocaine, and
- (4) trafficking in a controlled substance,

knowingly possessed a firearm and ammunition in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924.

## FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. §§ 922(g), the defendant, **ADAM ROBERT MANN**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and
28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to:

- a. a Glock model 42 .380 caliber pistol, serial number ACWX683;
- b. a Beretta model 96A1 .40 caliber pistol, serial number A69157M;
- c. approximately 5 Winchester .380 auto cartridges;
- d. approximately 8 .40 S&W cartridges; and
- e. approximately 1 Federal-brand .40 S&W cartridge.

A TRUE BILL:

FOREPERSON OF THE GRAND JUR

Assistant United States Attorney